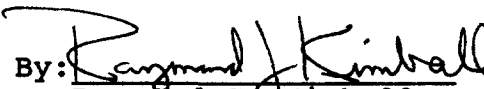


knowledge or benefit of the proposed artificial benchmark standards. The "Achievement Period" and other proposals advanced herein are more consistent with the public interest than the arbitrary benchmarks and uneven processing gates proposed by the Commission.

WHEREFORE, the premises considered, the Commission should adopt rules, and modify its proposed rules, consistent with these comments.

Respectfully submitted,
METAGRAM AMERICA INC.

Dated: May 6, 1993

By: 
Raymond J. Kimball

ROSS & HARDIES
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CERTIFICATE OF SERVICE

I, Rose I. Dodson, a secretary in the law office of Ross & Hardies, do hereby certify that I have this 6th day of May, 1993, served by first-class mail, postage pre-paid, a copy of the foregoing "Comments of Metagram America Inc." to:

Dennis C. Brown, Esquire*
Brown & Schwaninger
1835 K Street, N.W.
Suite 650
Washington, D.C. 20006

Counsel to Metromedia Paging
Services, Inc.


Rose I. Dodson

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